

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

DAVID MARTINEZ TORRES

DEBTOR

CASE NO. 19-03342/ESL

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION FOR
TRUSTEE'S REQUEST ENTRY OF ORDER, DOCKET NO. 46**

TO THE HONORABLE COURT:

NOW COMES, DAVID MARTINEZ TORRES, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 19, 2023, the Chapter 13 Trustee filed a *Trustee's Request Entry of Order*, Docket No. 46, whereby the Trustee requests the Court to Order the Debtor to tender to the Trustee the Debtor's 2019, 2020, 2021 and 2022 tax returns.

2. The Debtor hereby respectfully submits that on January 18, 2024, he provided to the Trustee (uploaded to the Trustee's system) copy of his income tax returns pertaining to years 2019, 2020, 2021 and 2022 tax returns.

3. The Debtor respectfully states that he did receive the following tax refunds: 2021/\$1,694.00 and 2022/\$3,615.00 (2019/\$0.00, 2020/\$0.00).

4. On January 18, 2024, the Debtor filed a *Debtor's Motion Requesting Order Re: Ratification of the Use of Funds from the 2021 and 2022 Tax Refunds*, in the above captioned case.

5. Based on the above stated, the Debtor respectfully requests this Honorable Court to deny the *Trustee's Request Entry of Order*, Docket No. 46, since the Debtor has already submitted copy of his tax returns for the years 2019, 2020, 2021 and 2022 in the above captioned case.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and deny the Trustee's request for entry of order, Docket No. 46, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to the CM/ECF participants, including the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor, David Martines Torres, to the address of record: 221 Ave. Font Martelo, Humacao PR 00791.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of January, 2024.

/s/Roberto Figueroa Carrasquillo

USDC 203614

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